

REMARKS

Fairly substantive amendments are contained in the above-mentioned reworking of the independent claims as previously considered. While the independent claims still capture the same inventive concept and recite the same inventive features, the language of the claims has been reworked. These changes preserve the invention as originally disclosed and claimed while additionally more clearly reciting the substantive differences between the invention as now claimed and the cited prior art of record.

Also included is a new dependent claims which serves to more clearly define the invention.

Specific features of the newly claimed invention, which have been more clearly delineated include the term “goods/services voucher” which has been replaced with the term “stored value instrument”. This amendment is believed to more clearly distinguish over any type of voucher (such as a discount voucher), which as previously argued and again stated does not have any inherently stored value.

The Fortenberry reference does not contemplate a system for the issue and redemption of stored value instruments, but rather is only concerned with issuance of coupons (e.g. such as discount coupons). The considerations required when issuing and redeeming stored value instruments is different from the considerations when generating coupons.

Similarly, the Jacoves reference does not contemplate a system for issuance and redemption of stored valued instruments, but rather is only concerned with issuance of reward program information. Such information, while providing a discount to end consumers, is not a stored value instrument, as there are no funds set aside against each individual instrument, in

contrast with the claimed invention. Similarly, the Scroggie et al. reference does not contemplate a system and method for the issuances and redemption of stored value instruments. As with Jacoves, the embodiment described is only relevant to a “fuel reward program system” (see column 3, lines 14-24). Indeed, Scroggie et al. at numerous locations throughout the detailed description, refers variously to “redemption slips”, discount triggering items”, “awards” and “discounts”. The entire system of Scroggie is directed to the issuance of discount coupons which do not represent a defined monetary value, in contrast to a stored value instrument, which is associated with a bank account or another pool of funds. In other words, the present invention is in the field of monetary transactions, including devices such as credit cards and checks, but is not concerned with discount vouchers, promotional vouchers or other similar systems. This distinction may seem trite at first glance, however, it is essential to the manner in which such instruments are processed, as discount vouchers have no inherent value, and therefore do not require strict security measures to be taken during issuance and redemption.

Reference to the use of a randomly generated alphanumeric token for example. Such a feature finds support in the specification at, for example, page 28, lines 6-10. The alphanumeric token, by virtue of its relative simplicity, allows the stored valued instrument to be redeemed via any one of a number of pathways. That is, an alphanumeric token is a piece of information that can generally be provided via any suitable communications system including a computer keyboard, a retail terminal (e.g. an electronic cash register or an EFTPOS machine) or even if necessary, over a voice communication network, such as a telephone.

The use of an alphanumeric token also allows the token to be carried in any one of a number of forms, including on paper, in electronic format, embodied in a hardware device, etc. This provides the maximum amount of usability and convenience to an end user. That is, unlike

prior art systems, a user is not required to use any proprietary hardware and/or software in order to redeem the value embodied in the stored value instrument.

This is in stark contrast to each one of the prior art documents cited in the outstanding Office Action. The Examiner contends at paragraph 20, that each of Manasse, Scroggie or Jacoves discloses the use of a “token”. However, the tokens defined in any one of the three cited prior art documents are tokens which cannot be transported or transmitted in any one of a variety of manners.

Firstly, Fortenberry (WO 99/38256) relies on the transfer of machine readable computer files to deliver a coupon to an end user. As the coupon is a machine readable file, it cannot be transferred over the telephone, nor can it be transferred via a piece of paper. Therefore, it cannot be provided over a “plurality of pathways”. It is asserted at paragraph 20 of the contends that Fortenberry, by use of the term “coupon” provides a functionally equivalent device. Applicant contends that there is no disclosure in Fortenberry of a system which provides an alphanumeric token which is then compared against another alphanumeric token in a database. After careful review, the Fortenberry reference discloses the use of machine readable files. An alphanumeric token is transportable or transmittable via a plurality of pathways both on-line and off-line. A machine readable file is not. It would be impossible for a user, on implementing a system in accordance with Fortenberry to provide the machine readable computer file over say, a telephone or other non-computer device. For this reason, the present invention is submitted clearly distinguished from Fortenberry.

Manasse also contemplates a system of scrips which are encrypted information which is only decipherable by the originator (see page 6, lines 13 to 14). Such a scrip is only usable in an

electronic environment. It would not be sensible or reasonable for a person to physically provide a scrip on a piece of paper or other electronic medium. In contrast, the present invention advantageously allows a user to provide an alphanumeric token which may be transported in any one of a number of ways.

Scroggie is also silent on the ability to redeem stored value instruments via a plurality of pathways. Scroggies is wholly concerned with an electronic system. While there is reference to the creation of paper coupons, it is made clear at column 10, line 9-13 of this reference that any printed coupons would only be valid at a particular supermarket and invalid everywhere else. In other words, the system of Scroggie does not include any electronic method for verifying the authenticity of the coupon. The progress generally described at columns 10 and 11 of Scroggie are solely directed to the application of watermarks (an other similar visible devices) to prevent or deter frauduries. This does not provide the advantages of the present invention, namely that the present invention can be utilized as a stored value instrument, because it provides an alphanumeric token which may be compared to a token in a database to detect fraudulent stored value instruments.

Lastly, Jacoves is, as stated earlier, is concerned with gathering information regarding the reimbursement of discount vouchers. Examiner refers to Figures 2, 8, 10 and 25. None of the figures cited disclose the use of a randomly generated alphanumeric token, nor do any of the figures disclose a system whereby a stored value instrument may be redeemed via any one of a plurality of pathways. Jacoves seems to be concerned purely with electronic transactions.

Moreover, none of the cited references contemplate use of a randomly generated token. Each of Fortenberry, Manasse, Scroggie and Jacoves, insofar as they refer to identifiers or

tokens, refer to token which incorporate “serial numbers”. A serial number is a number which, by definition, forms part of a sequence of pattern of numbers. The use of a serial number leaves the systems of the prior art more open to fraud, as serial numbers may be guessed or generated if the series is known.

A randomly generated number, in contrast, cannot be guessed. Even if a potential fraudster were to know the formula for generating the random number, there would be no guarantee that they would be able to generate the same number as was previously generated.

We also take this opportunity to point out some of the advantages offered by the claimed invention. If you believe such advantages should be relayed to the Examiner, or that an amendment should be made to more clearly bring out these advantages, please let us know.

Turning to said advantages, the system as now claimed allows for more simple and efficient issuance, tracking and redemption of stored value instruments because:

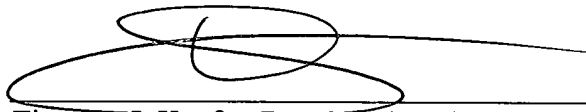
1. It allows a user (either a customer or sales person in a store) to input the token without the need for special skills or training. That is, it frees the user from a need to use a proprietary interface.
2. It allows the user to input the token via a plurality of pathways, including via a telephone, via the Internet, via a POS or an EFTPOS terminal. That is, it frees the user from utilizing any one type of communications technology.
3. It allows the store to track each individual transaction, which is almost impossible to do efficiently with a paper-based gift voucher system. In practical terms, a large retail chain with hundreds of branches cannot effectively manage a paper-based gift voucher system.

4. It allows the store to issue gift vouchers via third parties. The store can allow third parties to generate their gift vouchers without any direct contact with the store.
5. It allows the user to redeem a gift voucher at any one of a number of stores. The gift voucher is not tied to a particular branch.
6. It allows the store to instantly cancel gift vouchers and reissue gift vouchers as necessary, irrespective of where or how a gift voucher was recently issued.
7. The simplicity of the alphanumeric token allows the system to process large volumes of transactions without the need for proprietary hardware or software on the part of the user or the store. That is, prior art electronic systems that provide electronic monetary systems usually require users to possess proprietary software (e.g. electronic wallets) or hardware (e.g. a smartcard). The use of an alphanumeric coding combination with a central database removes the need for the user to possess any particular hardware or software.

Accordingly, favorable reconsideration and early issuance of the Notice of Allowance are solicited.

Respectfully Submitted,

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